

PETERSON BAKER, PLLC
701 S. 7th Street
Las Vegas, NV 89101
702.786.1001

TAMARA BEATTY PETERSON, ESQ., Bar No. 5218
tpeterson@petersonbaker.com
PETERSON BAKER, PLLC
701 S. 7th Street
Las Vegas, NV 89101
Telephone: 702.786.1001
Facsimile: 702.786.1002

Thomas C. Hardy, SBN 6294305 (*pro hac vice*)
thardy@reedsmith.com
REED SMITH LLP
10 South Wacker Drive, 40th Floor
Chicago, IL 60606-7507
Telephone: 312.207.1000
Facsimile: 312.207.6400

*Attorneys for Defendant Rocky Mountain Hospital
and Medical Service, Inc. dba Anthem Blue Cross and
Blue Shield*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

STEVEN P. BRAZELTON, an Individual,
NATHALIE HUYNH, an Individual, and JHB,
an individual,

Plaintiffs,

vs.

ROCKY MOUNTAIN HOSPITAL AND
MEDICAL SERVICE, INC., a Colorado
Corporation doing business as HMO Nevada,
Anthem Blue Cross and/or Blue Shield; HMO
Colorado, INC., a Colorado Corporation doing
business as HMO Nevada, Anthem Blue Cross
and/or Blue Shield; BLACK CORPORATIONS
1-10, and DOES I-X, Inclusive,

Defendants.

Case No: 2:24-cv-00994-GMN-BNW

**STIPULATED MOTION FOR
EXTENSION OF TIME TO RESPOND
TO PLAINTIFFS' MOTION TO
COMPEL DISCOVERY**

(First Request)

Defendants ROCKY MOUNTAIN HOSPITAL AND MEDICAL SERVICE, INC., and
HMO COLORADO, INC. (collectively "Defendants"), by and through their attorneys of record,
Peterson Baker, PLLC and Reed Smith LLP, and Plaintiffs STEVEN P. BRAZELTON, NATHALIE

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HUYNH, and JHB, by and through their attorneys of record, Bighorn Law (collectively “Plaintiffs”), hereby stipulate and agree, subject to the Court’s approval, to extend the deadline for Defendants to respond to Plaintiffs’ Motion to Compel Defendants’ Compliance with Fed. R. Civ. P. 26(f) (ECF No. 38).

Procedural Background

1. On March 8, 2025, Plaintiffs filed their Motion to Compel Defendants’ Compliance with Fed. R. Civ. P. 26(f) (“Motion”). ECF No. 38.

2. Currently, the deadline for Defendants to respond to the Motion is March 24, 2025.

3. The Parties stipulate that the deadline for Defendants’ response be extended to April 4, 2025. Plaintiffs’ Reply in Support of their Motion shall be due seven days after the service of Defendants’ response to the Motion. LR 7-2(b).

Reasons Why An Extension is Necessary

4. The Parties believe that conferring further on the issues subject to Plaintiffs’ Motion would be beneficial in order to determine if the issues can be resolved or narrowed without judicial intervention.

5. In addition, Defendants’ lead counsel Thomas C. Hardy is on vacation March 24 through March 31.

6. Defendants also require additional time in order to prepare evidence in support of their response to the Motion and would likely save additional resources in the preparation of such evidence if the Parties were to agree on some of the issues that are the subject of the pending Motion.

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This stipulation is without prejudice to either Party, is made in good faith, with good cause, and not for the purpose of unduly delaying discovery or trial. This is the first request to extend the time to file a response to the Motion.

IT IS SO STIPULATED.

DATED: March 24, 2025.

PETERSON BAKER, PLLC

BIGHORN LAW

/s/ Tamara Beatty Peterson
TAMARA BEATTY PETERSON, ESQ.
Bar No. 5218
tpeterson@petersonbaker.com
PETERSON BAKER, PLLC
701 S. 7th Street
Las Vegas, NV 89101
Telephone: 702.786.1001
Facsimile: 702.786.1002

/s/ Joshua P. Barrett
JOSHUA P. BERRETT, ESQ.
Bar No. 12697
josh@bighornlaw.com
BIGHORN LAW
3675 W. Cheyenne Avenue, Ste. 100
North Las Vegas, Nevada 89032
Telephone: 702.333.1111

Attorneys for Plaintiffs

Thomas C. Hardy, SBN 6294305 (*pro hac vice*)
thardy@reedsmit.com
REED SMITH LLP
10 South Wacker Drive, 40th Floor
Chicago, IL 60606-7507
Telephone: 312.207.1000
Facsimile: 312.207.6400

*Attorneys for Defendant Rocky Mountain
Hospital and Medical Service, Inc. dba Anthem
Blue Cross and Blue Shield*

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: March 25, 2025

PETERSON BAKER, PLLC
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